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**UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, )  
Plaintiff, )  
vs. )  
HERNAN CHAVEZ-TORRES, )  
Defendant. )

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Case No.: 2:23-mj-00212-BNW

## **STIPULATION TO CLOSE CASE**

IT IS STIPULATED AND AGREED, by and between JASON M. FRIERSON,  
United States Attorney, and IMANI DIXON, Assistant United States Attorney, counsel for  
the United States of America, and JASON BARRUS, counsel for the defendant HERNAN  
CHAVEZ-TORRES, that the above-captioned matter be closed.

This Stipulation is entered into based upon the following:

1. On or about May 25, 2023, defendant entered into a Petty Offense Agreement with the United States in which he agreed to plead guilty to the amended Count One of the Complaint, Reckless Driving, in violation of 36 C.F.R. § 4.2 and NRS 484B.653. *See* ECF No. 8.

2. The parties agreed to recommend that defendant be sentenced to one year of unsupervised probation with the following special conditions: (i) pay a \$500 fine and a

1 mandatory \$10 penalty assessment; and (ii) attend and complete the Lower Court  
2 Counseling's (1) DUI course and (2) Victim Impact Panel.

3       3. On May 25, 2023, this Court sentenced defendant pursuant to the parties' plea  
4 agreement. *See* ECF No. 8.

5       4. Since commanding his term of unsupervised probation, defendant has  
6 successfully completed conditions (i) and (ii).

7       5. As such, the parties jointly request that the above-captioned matter be closed.  
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10      DATED this 27<sup>th</sup> day of November, 2023.

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12      Respectfully submitted,  
13      JASON M. FRIERSON  
United States Attorney

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15      \_\_\_\_\_  
16      /s/ *Jason Barrus*  
JASON BARRUS, ESQ.  
Attorney for Defendant  
**HERNAN CHAVEZ-TORRES**

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18      \_\_\_\_\_  
19      /s/ *Imani Dixon*  
IMANI L. DIXON, ESQ.  
Assistant United States Attorney

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2                   **UNITED STATES DISTRICT COURT**  
3                   **IN AND FOR THE DISTRICT OF NEVADA**

4  
5                   UNITED STATES OF AMERICA,         )  
6                   Plaintiff,                                  )  
7                   vs.    )  
8                   HERNAN CHAVEZ-TORRES,                )  
9                   Defendant.                                )  
10    )  
11    )

12    Case No.: 2:23-mj-00212-BNW

13    **ORDER TO CLOSE THE CASE**

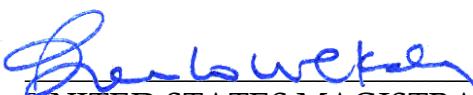
14    Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
15 Court finds that:

16    1.     Defendant Hernan Chavez-Torres has successfully completed the conditions of  
17 his sentencing.

18    **ORDER**

19    IT IS HEREBY ORDERED that the parties move the Court in the above-captioned matter  
20 case be closed, as all requirements have been completed.

21    DATED this 28th day of November, 2023

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23    \_\_\_\_\_  
24    UNITED STATES MAGISTRATE JUDGE